

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION**

Master File No. 07-5944 SC

MDL No. 1917

This Document Relates to:

Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,
No. 11-cv-05513-SC

*Best Buy Co., Inc., et al. v. Technicolor SA, et
al.*, No. 13-cv-05264-SC

*Target Corp. v. Chunghwa Pictures Tubes,
Ltd., et al.*, No. 3:07-cv-05514-SC

Target Corp. v. Technicolor SA, et al., Case
No. 3:11-cv-05514-SC

*Alfred H. Siegel, as Trustee of the Circuit City
Stores, Inc. Liquidating Trust v. Hitachi, Ltd.,
et al.*, No. 11-cv-05502-SC

*Alfred H. Siegel, as Trustee of the Circuit City
Stores, Inc. Liquidating Trust v. Technicolor SA, et
al.*, No. 13-cv-05261-SC

*Sears, Roebuck and Co., et. al. v. Chunghwa
Picture Tubes, Ltd., et al.*, No. 11-cv-5514

*Sharp Electronics Corporation, et al. v.
Hitachi, Ltd., et al.*, No. 13-cv-01173-SC

*Sharp Electronics Corp., et al. v. Koninklijke
Philips Electronics N.V., et al.*,
No. 13-cv-2776-SC

*ViewSonic Corporation v. Chunghwa Picture
Tubes, Ltd., et al.*, No. 14-cv-02510

**DECLARATION OF JONATHAN J.
ROSS IN SUPPORT OF DIRECT
ACTION PLAINTIFFS'
ADMINISTRATIVE MOTION TO
SEAL PORTIONS OF THEIR
REPLY AND EXHIBITS TO THEIR
MOTIONS IN LIMINE (NOS. 1-18)**

The Honorable Samuel Conti

DECLARATION IN SUPPORT OF PLAINTIFFS' ADMINISTRATIVE MOTION TO FILE DOCUMENTS UNDER
SEAL

Master File No. 3:07-cv-5944 SC

1 I, Jonathan J. Ross hereby declare as follows:

2 1. I am attorney and counsel for plaintiff Alfred H. Siegel, solely in his capacity as
3 Trustee of the Circuit City Stores, Inc. Liquidating Trust.

4 2. I submit this declaration in support of Direct Action Plaintiffs' Administrative Motion
5 to Seal Portions of Their Reply and Exhibits in Support of Their Motions in Limine (Nos. 1-18)
6 Pursuant to Civil Local Rules 7-11 and 79-5(d).

7 3. Portions of Direct Action Plaintiffs' Reply contain excerpts from and/or statements
8 derived from documents and testimony which have been designated "confidential" or "highly
9 confidential" pursuant to the Stipulated Protective Order governing this litigation [D.E. 306, June 18,
10 2008] ("Stipulated Protective Order"). The confidential/highly confidential designations were made
11 by certain defendants in this litigation. To qualify as confidential or highly confidential under the
12 Stipulated Protective Order, information must contain trade secrets or other confidential research,
13 development, or commercial information or private or commercially sensitive information. Stipulated
14 Protective Order ¶ 1.

15 4. The Stipulated Protective Order requires that a party may not file any confidential
16 material in the public record. Stipulated Protective Order ¶ 10. The Stipulated Protective Order
17 further provides that any party seeking to file any confidential material under seal must comply with
18 Civil Local Rule 79-5. Stipulated Protective Order at ¶¶ 1, 10.

19 5. The highlighted portions of Plaintiffs' Reply contain such material.

20 6. Ex. F to the Ross Declaration, an excerpt from the August 5, 2014, Reply Expert Report
21 of Dr. Dennis Carlton, contains such material.

22 7. Therefore, Direct Action Plaintiffs respectfully request an order sealing portions of
23 Direct Action Plaintiffs' Reply.

24 I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 6th day of March, 2015 at Houston, Texas.

/s/ Jonathan J. Ross
Jonathan J. Ross